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District Judge Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square
New York, NY 10007

Application granted in part. The initial pretrial conference scheduled for March 8, 2023, is adjourned to March 29, 2023, at 4:00 P.M. At that time, the parties shall call 888-363-4749 and use the access code 558-3333. The deadline for the parties to file the joint letter and proposed civil case management plan and scheduling order is extended to March 22, 2023, at 12:00 P.M.

Dated: February 24, 2023
New York, New York

February 23, 2023

Re: 1:23-cv-00168-LGS

McDougall v. Samsung Electronics
America, Inc.


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Dear District Judge Schofield:

This office represents the Plaintiff. In accordance with the Court's Individual Rules, Plaintiff requests to adjourn the initial status conference is currently scheduled for March 8, 2023, at 4:00 PM until April 24, 2023, at 4:00 PM with accompanying submissions due by April 17, 2023.

This action was filed on January 8, 2023. ECF No. 1. The original date by which service is required to be proved to the Court is April 10, 2023. Fed. R. Civ. P. 4(m) (allowing 90 days for defendant to be served); Fed. R. Civ. P. 6(a)(1)(A)-(B) (excluding the date triggering the period and counting intermediate weekends).

On January 18, 2023, "a copy of the complaint, 2 copies of the waiver form appended to this Rule 4, and a prepaid means for returning the form" was sent to Defendant's registered agent as indicated on the summons. Fed. R. Civ. P. 4(d)(1)(C).

Plaintiff expects Defendant to waive service of process in accordance with the Federal Rules. The waiver of service will allow Defendant and any attorneys additional time to become familiar with the action and will result in the conservation of judicial resources. Fed. R. Civ. P. 4(d)(4).

There have been no previous requests for an adjournment of the initial conference and extension of time to file the accompanying submissions. Defendant has not appeared and therefore this request is without their consent. This request does not affect any other dates. This request is submitted at least 48 hours prior to the initial conference. Thank you.

Respectfully submitted,

/s/Spencer Sheehan

Certificate of Service

I certify that on February 23, 2023, I served and/or transmitted the foregoing by the method below to the persons or entities indicated, at their last known address of record (blank where not applicable).

	CM/ECF	First-Class Mail	Email	Fax
Defendant's Counsel	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Plaintiff's Counsel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Courtesy Copy to Court	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

/s/ Spencer Sheehan